

Exhibit A

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

JACQUELYN HOPKINS,

Plaintiff,

-against-

BJ' s WHOLESALE CLUB, INC.,

Defendants.

X

Index No.:

Date Filed:

Plaintiff designates Kings County
as the place of trial

The basis of the venue is Plaintiff's
residence

SUMMONS

Plaintiff resides at
3801 Avenue H
Brooklyn, NY 11210

To the above named Defendants

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance, on the Plaintiff's attorneys Gary P. Kauget, P.C. within 20 days after the service of this summons, exclusive of the day of service (or within 30 days after the service is complete if the summons is not personally delivered to you within the State of New York); and in the case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: Brooklyn, New York

Defendant's Addresses:

BJ' s Wholesale: 900 Remsen Avenue, Brooklyn, NY



Gary P. Kauget, P.C.
Attorneys for Plaintiff
9201 Fourth Avenue, Suite 200A
Brooklyn, NY 11209
(718) 833-2496

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

JACQUELYN HOPKINS,

X

Plaintiff,

VERIFIED COMPLAINT

-against-

Index Number:

Date Filed:

BJ's WHOLESALE CLUB, INC.,

Defendant.

X

Plaintiff, by her attorney, Gary P. Kauget, P.C.
complaining of the defendant, alleges upon information and belief
as follows:

FIRST: That at all times hereinafter
mentioned the plaintiff JACQUELYN HOPKINS was and is a resident of
the County of Kings, State of New York.

SECOND: Upon information and belief, that at
all times hereinafter mentioned defendant BJ's WHOLESALE CLUB,
INC. was and is a domestic corporation, organized and existing
under and by virtue of the laws of the State of New York, and
maintains its principal office in the County of Kings, State of
New York.

THIRD: Upon information and belief, that at
all times and places hereinafter mentioned, the defendant BJ's
WHOLESALE CLUB, INC. was a corporation duly organized and existing
under and by virtue of the laws of the State of New York.

FOURTH: Upon information and belief, that at all times and places hereinafter mentioned, the defendant BJ's WHOLESALE CLUB, INC. was a foreign corporation doing business in the State of New York.

FIFTH: That at all times herein mentioned the defendant BJ's WHOLESALE CLUB, INC. their agents, servants and employees controlled the premises known as and by 900 Remsen Avenue, in the County of Kings, City and State of New York.

SIXTH: That at all times herein mentioned the defendant BJ's WHOLESALE CLUB, INC. their agents, servants and employees maintained the premises known as and by 900 Remsen Avenue, in the County of Kings, City and State of New York.

SEVENTH: That at all times herein mentioned the defendant BJ's WHOLESALE CLUB, INC. their agents, servants and employees managed the premises known as and by 900 Remsen Avenue, in the County of Kings, City and State of New York.

EIGHTH: That at all times herein mentioned the defendant BJ's WHOLESALE CLUB, INC. his agents, servants and employees owned a store located at premises known as and by 900 Remsen Avenue, in the County of Kings, City and State of New York.

NINTH: That the defendants BJ's WHOLESALE CLUB, INC. their agents, servants and employees had a duty to properly maintain said premises and to keep said premises in a reasonably safe condition.

TENTH: That the defendants BJ's WHOLESALE CLUB, INC. their agents, servants and employees breached their duty to maintain said premises and to keep said premises in a reasonably safe condition.

ELEVENTH: That on March 12, 2020 the plaintiff JACQUELYN HOPKINS was lawfully upon said premises.

TWELFTH: That on March 12, 2020, while lawfully upon said premises and more particularly by the escalator located upon said premises, the plaintiff JACQUELYN HOPKINS was caused to sustain serious and severe personal injuries when an employee of the store struck the plaintiff with a large wheeled container containing garbage as a result of the negligence of the defendants, their agents, servants, and employees in their ownership, maintenance and control of said premises.

THIRTEENTH: That the foregoing occurrence was caused solely and wholly as a result of the negligence of the defendants, their agents, servants, and employees, without any negligence on the part of the plaintiff contributing thereto.


FOURTEENTH: That as a result of the foregoing, plaintiff JACQUELYN HOPKINS sustained serious, severe and permanent personal injuries.

FIFTEENTH: That this action falls within one or more of the exceptions set forth in CPLR 1602.

SIXTEENTH: That as a result of the foregoing

plaintiff has been damaged in an amount that exceeds all of the jurisdictional limits of the lower Courts.

WHEREFORE, plaintiff demands judgment against the defendants in an amount to be determined at the time of trial, together with the costs and disbursements of this action.


GARY P. KAUGET, P.C.
Attorney for Plaintiff
9201 Fourth Avenue, Suite 200A
Brooklyn, NY 11209
(718) 833-2496

VERIFICATION BY AFFIDAVIT

STATE OF NEW YORK


SS:

COUNTY OF KINGS

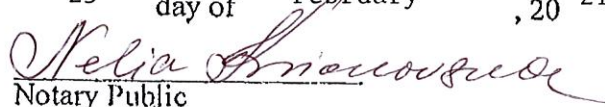
JACQUELYN HOPKINS, being duly sworn, says:

I am a Plaintiff in the action herein: I have read the annexed **COMPLAINT** and know the contents thereof, and the same are true to my knowledge, except those matters therein which are stated to be alleged upon information and belief, and as to those matters I believe them to be true. My belief as to those matters therein not stated upon knowledge, is based upon facts, records, and other pertinent information contained in my personal files.

DATED: Brooklyn, New York
February 25, 2021


JACQUELYN HOPKINS

Sworn to before me this
25 day of February, 2021


Notary Public

Nelia Krioukovskala
Notary Public State of NY
No 01KR6047381
Qualified in Kings County
Commission Expires August 28, 2024
